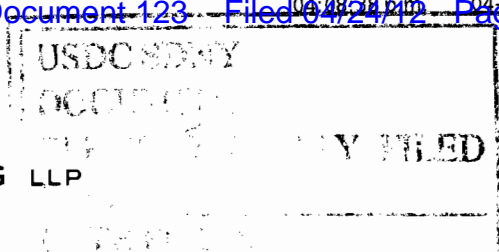


## COVINGTON &amp; BURLING LLP

THE NEW YORK TIMES BUILDING  
620 EIGHTH AVENUE  
NEW YORK, NY 10018-1405  
TEL 212.841.1000  
FAX 212.841.1010  
WWW.COV.COM

BEIJING  
BRUSSELS  
LONDON  
NEW YORK  
SAN DIEGO  
SAN FRANCISCO  
SILICON VALLEY  
WASHINGTON



JONATHAN M. SPERLING  
TEL 212.841.1010  
JSPEARLING@COV.COM

April 23, 2012

## BY FACSIMILE

The Honorable George B. Daniels  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**SO ORDERED**  
The conference is scheduled for  
May 10, 2012 at 9:30 a.m.  
APR 24 2012  
*George B. Daniels*  
HON. GEORGE B. DANIELS

Re: *Shropshire v. Sony Music Entertainment*, No. 06 Civ. 3252  
*The Youngbloods v. BMG Music*, No. 07 Civ. 2394

Dear Judge Daniels:

We represent defendants in the above-referenced actions. We write on behalf of all parties in connection with the class settlements in these actions, which the Court preliminarily approved on March 9, 2012.

The parties intend to amend the settlements to clarify the scope of relief thereunder. The parties therefore respectfully request that the Court schedule at its earliest possible convenience a conference at which the parties can present these amendments and seek an amended preliminary order, in order to promptly provide amended notice to the class.

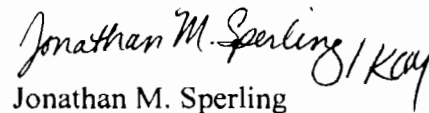
For the same reason, the parties also seek adjournment of the deadline under the Court's preliminary approval order for publication of summary notice. The order currently provides for notice to be published in *Billboard* magazine on or before May 6. In light of *Billboard*'s publication schedule, that would require defendants to provide the ad copy to *Billboard* no later than this Wednesday, April 25. The parties believe that the interests of the class will be best served by publication of a single summary notice, and therefore request adjournment of the publication deadline pending the parties' presentation to the Court of the proposed amended summary notice.

COVINGTON & BURLING LLP

The Honorable George B. Daniels  
April 23, 2012  
Page 2

Accordingly, the parties respectfully request that the Court (i) schedule a conference at which the parties can present a proposed amended settlement, and (ii) in the interim, adjourn the deadline under the Court's preliminary approval order for publication of summary notice.

Respectfully submitted,

  
Jonathan M. Sperling

cc: Brian D. Caplan  
Thomas A. Cohen  
Sanford P. Dumain  
Benjamin Y. Kaufman  
Jonathan J. Ross  
Gary S. Snitow  
Gerald D. Weiner